



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

M60050\_003607  
MCAS EL TORO  
SSIC NO. 5090.3.C

April 11, 2003

Mr. F. Andrew Piszkin  
BRAC Environmental Coordinator  
Base Realignment and Closure  
Marine Corps Air Station, El Toro  
7040 Trabuco Road  
Irvine, CA 92618

RE: Draft Environmental Baseline Survey(February 7, 2003), Technical Information Package of Potential Release Locations Investigation Results(March 20, 2003), and Technical Sheets for Runways and Pesticide Mixing Area(April 3, 2003), Former MCAS El Toro

Dear Mr. Piszkin:

EPA has reviewed the reports referenced above. These reports document the current environmental condition of the base and will be used to support transfer and leasing of base property. Please note that EPA did not review information related to Temporary Accumulation Areas(TAA), RCRA Facility Assessment(RFA) sites, Above Ground Storage Tanks(AST), or Underground Storage Tanks(UST). The enclosed comments address our concerns.

If you have any questions, please call me at (415)972-3012.

Sincerely,

Nicole Moutoux  
Project Manager  
Federal Facilities Cleanup Branch

Enclosure

cc: Triss Chesney, DTSC  
John Broderick, RWQCB  
Kyle Olewnik, SWDIV  
Daniel Jung, City of Irvine  
Bob Woodings, RAB Co-Chair  
Marcia Rudolph, RAB Sub-Committee Chair

received  
4/21/03

**EPA Comments on  
Draft Environmental Baseline Survey  
MCAS El Toro  
April 2003**

**GENERAL COMMENTS**

1. As discussed at the Base Closure Team Meeting, because the current plan for Anomaly Area 3 is to include it with the cleanup for IRP Sites 3 and 5, please include discussion of it in the text of the section titled, Installation Restoration Program in Chapter 4.
2. Since the intended reuse is known, the EBS should make some reference to it.
3. Please note whether the NEPA requirement has been completed for the new intended reuse? There is no reference to it outside of Appendix E which is not included.

**SPECIFIC COMMENTS**

1. **Section 2.1.2, Non-Navy Sites, Page 2-4:** There is a discrepancy between the text and Table A-4 in Appendix A. The text on page 2-4 indicates that 7 new Locations of Concern (LOCs) identified by Geosyntec will be further investigated by the Navy. However, Table A-4 indicates that there are 8 sites (APHO-G78, TAA-G165, PCB-GT129, PCB-GT130, PCB-GT131, RFA-G747, RAILROAD-G, and RUNWAYS-G) to be investigated during the EBS. Please resolve this discrepancy.
2. **Section 2.1.4, Personnel Interviews, Page 2-9:** Although the only personnel interviewed in support of this EBS were current employees in occupied buildings that are leased (e.g., caretaker, golf course, stables), this information would be helpful in determining the current condition of the property. Please include a set of meeting notes for the interviews conducted in support of this EBS.
3. **Section 3.2.3, Surface Water and Hydrology, Page 3-2:** The statement, "Surface drainage in the vicinity of former MCAS El Toro generally flows southwest, following the slope of the land" is not supported by a figure. Please include a topographic figure of the site, or provide topographic information on a figure already included in the EBS.
4. **Section 4.1.1, Potential Release Locations Identified During 2002 EBS, Page 4-1, second bullet:** The text of this bullet indicates that two facilities were assigned an ECP Area Type of Category 5 due to petroleum products. Shouldn't they be category 2?
5. **Section 4.1.2.3, Aerial Photograph Feature/Anomaly Locations of Concern, Page 4-5:** The second paragraph of this section is unclear. The text indicates that 500 APHOs were identified and that, while the majority of these were associated with Installation

Restoration Program (IRP) sites, 53 features/anomalies could not be associated with an IRP site and required additional investigation as APHO LOCs. However, the text then indicates that 68 APHOs have been identified as LOCs and are discussed in this EBS. Please which sites account for the additional 15 LOCs.

6. **Section 4.1.2.3, Aerial Photograph Feature/Anomaly Locations of Concern, Page 4-5:** The EBS does not indicate under which program Anomaly Area 3 is being addressed. This area is identified in Table 4-4, page 4-82 as 7 APHOs that were newly designated and recommended for further investigation. The EBS does not address this new designation until Section 4.1.10 which discusses radioactive materials. Please cross-reference this information in Section 4.1.2.3 and discuss where and how this newly designated area will be addressed. (See general comment above)
7. **Table 4-4, Aerial Photograph Anomaly Sites, Page 4-78:** Several sites recommended for further investigation have a NFA letter associated with them. For example, APHO 31 is designated as an ECP Area Type of Category 7, yet the table associates a NFA letter from the Regional Water Quality Control Board (RWQCB) dated 01/17/2001 with this site. Please clarify this discrepancy.
8. **Section 4.1.3.6, Site 8 - DRMO Storage Yard, Page 4-10:** There is a discrepancy between this section and Section 4.1.3.16, Site 19 - Aircraft Expeditionary Refueling (ACER) Site, on page 4-16. The text on page 4-10 indicates that soil containing polychlorinated biphenyls (PCBs) was excavated in 1994 and used as fill at IRP 19. However, the text on page 4-16 indicates that this activity was performed in 1993. Please resolve this discrepancy.
9. **Section 4.1.3.16, Site 19, ACER Site, Page 4-16:** It is noted that excavation at site 19 was filled with soil containing PCBs from Site 8. Please note the concentrations of PCBs contained in the soil used for backfill and whether some type of disclosure to a potential buyer is necessary.
10. **Section 4.1.4.1, Aboveground Storage Tank Locations of Concern, Page 4-20:** There is a discrepancy between the text on page 4-20 and Table 4-6, Aboveground Storage Tanks (AST). The text indicates that one AST is inactive. However, Table 4-6 indicates that there are 2 inactive ASTs (ASTs 146 and 862). Please resolve this discrepancy.
11. **Section 4.1.4.1, Aboveground Storage Tank Locations of Concern, Page 4-20:** There is information missing from the text regarding the contents of ASTs. Table 4-6 indicates that JP-5 was stored in AST 682, however the text does not include JP-5 as a substance contained in ASTs. Please include this information in the text of Section 4.1.4.1.
12. **Section 4.1.4.1, Aboveground Storage Tank Locations of Concern, Page 4-20:** It is unclear if regulatory concurrence has been obtained for the ASTs requiring no further action. The text indicates that for ECP Area Type Categories 2a, 2b, and 3 regulatory concurrence has been obtained, however, this information is not included in Table 4-6.

Please provide assurance in Table 4-6 that regulatory concurrence has been obtained for ASTs requiring NFA.

13. **Section 4.1.5.2, Drainage Systems, Page 4-24 to 4-26:** Information regarding specific site practices and the ECP Area Type of Category is missing from this section. The text describes limits and requirements set forth by the permits under which MCAS El Toro was operating, but does not describe the actual activities which occurred during the lifetime of these permits. In addition, neither the Sanitary Sewers nor the Storm Water Drainage are given an ECP Area Type of Category. Please provide this missing information in the text of this section or note if it is presented elsewhere in the EBS.
14. **Section 4.1.5.5, Silver Recovery Unit Locations of Concern, Page 4-27:** There is a discrepancy between the text in this section and Table 4-10, Silver Recovery Units, page 4-139. The text indicates that all Silver Recovery Units (SRUs) were given an ECP Area Type of Category 7. However, Table 4-10 indicates that the ECP Category for SRU 03A is 5. Please resolve this discrepancy.
15. **Section 4.1.6, Polychlorinated Biphenyl Locations of Concern, Page 4-28:** It is not clear why transformer ID IRP 8 located at the DRMO Yard was given an ECP Category of 6. The notes in Table 4-11 on page 4-151 indicate that all required response actions have not yet been completed, indicating that the ECP Category would be 5. Please clarify.
16. **Section 4.1.6, Polychlorinated Biphenyl Locations of Concern, Page 4-30:** It is not clear why the site tracked at IRP Site 12 is not included in Table 4-11 or Figure 4-14. The text indicates that PCBs were detected in soil samples taken at the former sludge drying beds. Please include this site in Table 4-11 and on Figure 4-14.
17. **Section 4.2.1.2, Lead Based Paint, Page 4-40:** Please change the wording of the second bullet to state: "Evaluate the need for interim control abatement, or no action for bare soil lead concentrations between 400 and 1200ppm....", not 2000ppm.

#### MINOR COMMENTS

1. **Section 4.1.2.1, RCRA Facility Assessment (RFA) Locations of Concern, Page 4-3:** The text references Section 4.1.1.3 for Temporary Accumulation Areas (TAAs), Section 4.1.2 for IRP Sites, Section 4.1.3.2 for Underground Storage Tanks, Section 4.1.4.1 for Oil-Water Separators, and Section 4.1.5 for PCBs. These section numbers are not correct. Please revise the text so that it references the correct section numbers.
2. **Section 4.2.1.1, Asbestos-Containing Material, Page 4-38:** The text incorrectly references Table 4-14 for information regarding ACM surveys. This information is provided in Table 4-15. Please correct the text to provide the correct table reference.
3. **Section 4.2.1.4, Drinking Water Quality, Page 4-42:** The text references Table 4-15 for information regarding buildings that were regularly sampled. This information is

provided in Table 4-16. Please correct the text.

4. **Section 4.2.1.5, Air Quality, Page 4-42:** The text references Table 4-16 for information regarding buildings and their associated permitted emission sources. However, this information is provided in Table 4-17. Please correct the text.
5. **Figure 4-5, Installation Restoration Program Sites:** This figure is missing a line indicating where IRP 25 is located. Please provide this line on this figure.
6. **Appendix A, Summary of Environmental Factors by Facility:** The organization and formatting of this appendix is confusing. Continuous page numbers throughout Appendix A are not provided, and two different versions of Table A-4 are included. Neither table contains a complete acronym list in its footnotes. Table A-1 does not define what is meant by the letters "R" and "I" or the numbers in parenthesis. Please revise Appendix A and its tables so that they are formatted with continuous page numbers, only one Table A-4 is provided, and each table includes a definition for each acronym and feature presented within it.

**EPA Comments on  
Draft Technical Information Package of Potential Release Locations Investigation Results  
and Technical Sheets for Runways and Pesticide Mixing Area  
April 2003**

**GENERAL COMMENTS**

Please note that due to the limited number of samples that were collected at these PRLS and the screening nature of this investigation, when results are over PRGs, EPA generally makes the comment that further investigation should occur or more rationale should be provided.

**SPECIFIC COMMENTS**

1. **PRL 46:** EPA holds concurrence with NFA pending reporting of drain sample result.
2. **PRL 130:** In the background section, it is stated that NFA has been recommended for 3 TAAs. Please note which agency is reviewing this recommendation.
3. **PRL 133:** EPA holds concurrence with NFA pending drain sample results.
4. **PRL 165:** EPA holds concurrence pending perchlorate sample results.
5. **PRL 347:** EPA concurs with Navy's recommendation for NFA for this PRL.
6. **PRL 350:** EPA concurs with Navy's recommendation for NFA for this PRL.
7. **PRL 376:** EPA concurs with Navy's recommendation for NFA for this PRL. However please note that sample area is now on north end of building when in the specification sheet, it was shown on south end closer to clean out and sewer line. Please reconcile the figures.
8. **PRL 392:** EPA concurs with Navy's recommendation for NFA for this PRL.
9. **PRL 439:** EPA holds concurrence with NFA pending drain sample results.
10. **PRL 443:** The specification sheet for PRL 443 showed that a sample near former the SRU would be collected. No such sample appears to have been collected.
11. **PRL 447:** EPA concurs with Navy's recommendation for NFA for this PRL.
12. **PRL 458:** Please show discharge point to sewer from building.
13. **PRL 463:** In Navy's response to EPA's comments on this PRL, Navy indicated they would show locations of drains. Drains are not shown on the figure

14. **PRL 475:** EPA concurs with Navy's recommendation for NFA for this PRL.
15. **PRL 605:** Navy's response to EPA's comment on spec sheet was that relevant sampling near hazardous waste storage areas would be included but they are not. The concentration of arsenic at HA-2 must be further investigated. The next closest sample is over 120 feet away and the concentration significantly exceeds PRGs as well as MCAS El Toro background value for arsenic.
16. **PRL 606:** Navy's response to EPA's comments on the spec sheet for this PRL stated that previous relevant sampling locations would be shown at hazardous storage shed. These are not shown and additionally background information regarding the shed should be provided in the text.
17. **PRL 625/626:** Navy's response to EPA's comments on the spec sheet for this PRL stated that samples would be collected "from the drainage ditch, at the outfall of the Area Drain Overflow Pipe" as well as "beneath the grease interceptor". Neither of these samples are shown on the diagram. Were they collected?
18. **PRL 632:** EPA concurs with Navy's recommendation for NFA for this PRL.
19. **PRL 634:** EPA holds concurrence on this PRL pending drain sample results.
20. **PRL 636:** EPA concurs with Navy's recommendation for NFA for this PRL.
21. **PRL 651:** EPA concurs with Navy's recommendation for NFA for this PRL.
22. **PRL Runways:** EPA is unable to concur with NFA for the entire runway area. Due to the limited number of sample locations, it is appropriate to further investigate the area near HA-7 where benzo-a-pyrene was found exceeding PRGs.(See general comment above.)
23. **PRL Pesticide Mixing Area:** The concentrations of pesticides found at HA2 should be included on or with this technical sheet. Although the levels of pesticides decreased from HA2 to the next closest sample 15 feet away(DP-1), the fact that Dieldren was found right at the PRG in sample DP-1 taken along with the fact that Dieldren was found at extremely high levels in HA2 could indicate a fairly small hotspot that was not found with current sample locations. Please provide more rationale or further sampling to support NFA.